

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

COLLEEN O'DONNELL,)	
)	
Plaintiff,)	
)	Civil Action No: 04-40190-FDS
v.)	
)	
MICHAEL B. MUKASEY ¹ ,)	
Attorney General of the United States,)	
)	
Defendant.)	

JOINT MOTION FOR RETURN OF IMPOUNDED DOCUMENTS

Pursuant to this Court's Order dated March 18, 2008, the parties in the above-captioned matter respectfully move as follows that all documents that were filed in this case pursuant to a protective, confidentiality, or impoundment order shall be returned to the parties, and that such documents not be placed in the public record. The documents in question -- Document #21, Exhibits A & B, Exhibit 17; Document #26, Exhibits 1,3,4,6,9,,13,14,15,17 -- involve confidential information regarding the plaintiff or other employees of the United States that is protected from disclosure by the Privacy Act, 5 U.S.C. § 552a, and which were ordered impounded pursuant to an agreed-upon protective order which was adopted by this Court on August 22, 2005. Government counsel will make arrangements with the Court, should this motion be allowed, to take possession of the documents within thirty (30) days.

¹ Pursuant to Fed. R. Civ. P. 25(d)(1), Michael B. Mukasey is automatically substituted for his predecessor as Attorney General of the United States, Alberto Gonzales.

Respectfully submitted,

COLLEEN O'DONNELL,

MICHAEL B. MUKASEY,
Attorney General of the United States

By her attorney,

By his attorney,

MICHAEL J. SULLIVAN
United States Attorney

/s/ Dawn D. McDonald
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Dated: April 4, 2008